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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Standardized and Enhanced
Disclosure Requirements for
Television Broadcast Licensee
Public Interest Obligations

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MM Docket No. 00-168

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

**JOINT MOTION FOR EXTENSION OF TIME OF
REPLY COMMENT DEADLINE**

Pursuant to 47 C.F.R. § 1.46, the National Association of Broadcasters ("NAB");¹ the North Carolina Association of Broadcasters, Inc. ("NCAB");² the Virginia Association of Broadcasters ("VAB");³ The Walt Disney Company;⁴ Viacom Inc.;⁵ as well as, Alaska Broadcasters Association, Arizona Broadcasters Association, California Broadcasters Association, Colorado Broadcasters Association, Connecticut Broadcasters Association, Georgia Association of Broadcasters, Illinois Broadcasters Association, Indiana Broadcasters

¹ NAB is a nonprofit, incorporated association of television and radio stations and broadcast networks which serves and represents the American broadcast industry.

² NCAB is a voluntary non-profit trade association of some 23 television and 154 radio stations in North Carolina.

³ VAB is a voluntary non-profit trade association consisting of some 22 television stations and 104 radio stations in Virginia.

⁴ The Walt Disney Company is a publicly held media company, which owns and operates the ABC broadcast network and 10 television broadcast stations.

⁵ Viacom Inc. is a publicly held media company, which offers a wide range of content potentially affected by the Commission's proceeding through the CBS and UPN broadcast networks, owned and operated broadcast television stations, and the cable- and satellite-delivered program services Nickelodeon, Noggin and GAS (Games and Sports for Kids), as well as online sites related to those services.

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Association, Iowa Broadcasters Association, Kansas Association of Broadcasters, Kentucky Broadcasters Association, Louisiana Association of Broadcasters, Maine Association of Broadcasters, Maryland/District of Columbia/Delaware Broadcasters Association, Massachusetts Broadcasters Association, Michigan Association of Broadcasters, Minnesota Broadcasters Association, Mississippi Association of Broadcasters, Missouri Broadcasters Association, Montana Broadcasters Association, Nebraska Broadcasters Association, Nevada Broadcasters Association, New Hampshire Association of Broadcasters, New Mexico Broadcasters Association, The New York State Broadcasters Association, Inc., North Dakota Broadcasters Association, Ohio Association of Broadcasters, Oklahoma Association of Broadcasters, Oregon Association of Broadcasters, Pennsylvania Association of Broadcasters, South Carolina Broadcasters Association, South Dakota Broadcasters Association, Tennessee Association of Broadcasters, Texas Association of Broadcasters, Utah Broadcasters Association, Vermont Association of Broadcasters, Washington State Association of Broadcasters, West Virginia Broadcasters Association, Wisconsin Broadcasters Association, and Wyoming Association of Broadcasters (“State Associations”)⁶ (collectively, “Movants”) request that the Commission extend the reply comment deadline in the above-captioned proceeding by thirty (30) days. This reply comment deadline date is currently set at January 17, 2001. As discussed below, the Movants believe there is good cause for the Commission to provide a brief extension of the reply comment deadline in this proceeding. We recommend the adoption of the revised reply comment date of February 16, 2001.

⁶ The State Associations represent television and radio broadcasters in the above-named states and the District of Columbia.

In this proceeding, the Commission has sought comment on a number of proposals to standardize and enhance public interest disclosure requirements for television broadcasters, both analog and digital. These proposals included, *inter alia*, (1) the creation of a new standardized form that would inquire how licensees serve the public interest through the airing of certain defined categories of programming and through other means, and (2) a requirement for television licensees to make the entire contents of their public inspection files available on an Internet website.

Comments in this proceeding were filed on December 18, 2000, and the Commission's proposals have clearly generated a significant and wide-ranging discussion.⁷ Given the substantive nature of the comments and their divergent reaction to the Commission's proposals, the Movants request a brief extension of the deadline for filing reply comments.

The requested extension would enable Movants and other parties to evaluate and respond more carefully to the comments submitted in this proceeding. Given the intervening holidays, Movants believe that the time extension would be particularly helpful for all parties concerned in formulating useful and responsive reply comments. Movants also note that reply comments are due on the same date (January 17, 2001) in another important proceeding concerning the public interest obligations of television broadcasters.⁸ Because many of the same parties (including the Movants) are interested in both proceedings, an extension of time would be especially beneficial for these parties in preparing their replies.

⁷ As of December 28, 2000, the Commission's ECFS system showed that 21 sets of comments had been filed in this proceeding.

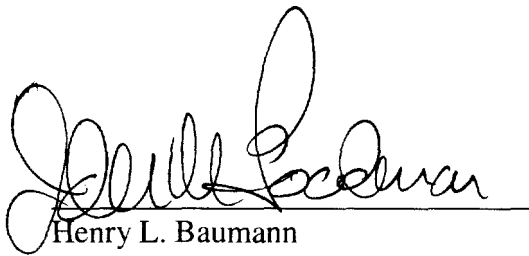
⁸ See *Notice of Proposed Rulemaking, Children's Television Obligations of Digital Television Broadcasters*, MM Docket No. 00-167 (rel. Oct. 5, 2000).

Based on the foregoing reasons, the Movants respectfully request that the Commission extend the reply comment deadline in this proceeding by thirty (30) days.

Respectfully submitted,

**NATIONAL ASSOCIATION OF
BROADCASTERS**

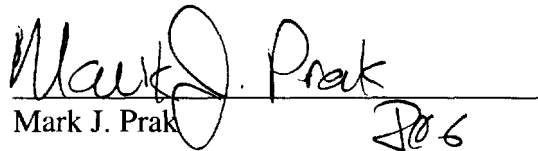
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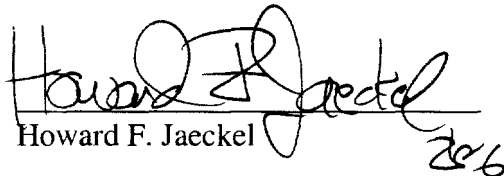
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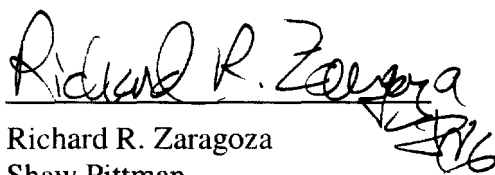
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Sam Antar

ALASKA BROADCASTERS ASSOCIATION, ARIZONA BROADCASTERS ASSOCIATION, CALIFORNIA BROADCASTERS ASSOCIATION, COLORADO BROADCASTERS ASSOCIATION, CONNECTICUT BROADCASTERS ASSOCIATION, GEORGIA ASSOCIATION OF BROADCASTERS, ILLINOIS BROADCASTERS ASSOCIATION, INDIANA BROADCASTERS ASSOCIATION, IOWA BROADCASTERS ASSOCIATION, KANSAS ASSOCIATION OF BROADCASTERS, KENTUCKY BROADCASTERS ASSOCIATION, LOUISIANA ASSOCIATION OF BROADCASTERS, MAINE ASSOCIATION OF BROADCASTERS, MARYLAND/DISTRICT OF COLUMBIA/DELAWARE BROADCASTERS ASSOCIATION, MASSACHUSETTS BROADCASTERS ASSOCIATION, MICHIGAN ASSOCIATION OF BROADCASTERS, MINNESOTA BROADCASTERS ASSOCIATION, MISSISSIPPI ASSOCIATION OF BROADCASTERS, MISSOURI BROADCASTERS ASSOCIATION, MONTANA BROADCASTERS ASSOCIATION, NEBRASKA BROADCASTERS ASSOCIATION, NEVADA BROADCASTERS ASSOCIATION, NEW HAMPSHIRE ASSOCIATION OF BROADCASTERS, NEW MEXICO BROADCASTERS ASSOCIATION, THE NEW YORK STATE BROADCASTERS ASSOCIATION, INC., NORTH DAKOTA BROADCASTERS ASSOCIATION, OHIO ASSOCIATION OF BROADCASTERS, OKLAHOMA ASSOCIATION OF BROADCASTERS, OREGON ASSOCIATION OF BROADCASTERS, PENNSYLVANIA ASSOCIATION OF BROADCASTERS, SOUTH CAROLINA BROADCASTERS ASSOCIATION, SOUTH DAKOTA BROADCASTERS ASSOCIATION, TENNESSEE ASSOCIATION OF BROADCASTERS, TEXAS ASSOCIATION OF BROADCASTERS, UTAH BROADCASTERS ASSOCIATION, VERMONT ASSOCIATION OF BROADCASTERS, WASHINGTON STATE ASSOCIATION OF BROADCASTERS, WEST VIRGINIA BROADCASTERS ASSOCIATION, WISCONSIN BROADCASTERS ASSOCIATION, AND WYOMING ASSOCIATION OF BROADCASTERS

A handwritten signature in dark ink, appearing to read "Richard R. Zaragoza", with a stylized flourish at the end.

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Counsel for the Named State Associations

December 28, 2000